

PATENT
App. Ser. No.: 10/718,218
Atty. Dkt. No. ROC920030251 US1
PS Ref. No.: IBMK30251

REMARKS

This is intended as a full and complete response to the Office Action dated June 16, 2006, having a shortened statutory period for response set to expire on September 18, 2006. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-41 are pending in the application. Claim 2 has been canceled. Claims 1 and 3-41 remain pending following entry of this response. Claims 1, 5-6, 9, 13, 17, 20, 24-25, 28, 36 and 39-41 have been amended. Applicants submit that the amendments do not introduce new matter. Support for these amendments can be found, at least, in paragraphs [0041] and [0064-0067].

Claim Objections

Claims 5, 9, 24, 28 are objected to because of the following informalities: The claims contain acronyms which can lead to multiple interpretations. Applicants have amended these claims to spell out the acronym and, thus, respectfully request withdrawal of this rejection.

Claim Rejections - 35 U.S.C. § 101

Claims 20- 38 are rejected under 35 U.S.C. 101 because the claimed invention is directed to non-statutory subject matter. Applicants submit, however, that these claims are directed to articles of manufacture (computer readable medium), which is statutory subject matter and, in any case, the process carried out when executing the program contained therein produces a concrete and tangible result. Accordingly, Applicants respectfully request withdrawal of this rejection.

Claim Rejections - 35 U.S.C. § 102

Claims 1-4, 6-8, 10-23, 25-27 and 29-41 are rejected under 35 U.S.C. § 102(b) as being anticipated by Patent No. 6,026,388 *Liddy et al* (hereinafter, "*Liddy*"). Subject

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matter of claims 20-23, 25-27, 28-31 and 32-38 are rejected in the provided for claims 1-4, 6-8 and 10-19. Applicants respectfully traverse this rejection.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

In this case, *Liddy* fails to teach each and every element of the claims. For example, with respect to claims 1, 20, 25, 39, and 40, *Liddy* fails to teach "creating an effective data abstraction model by modifying the data abstraction model in accordance with a view that reflects one or more security settings for a group of users; and displaying, to a user of the group of users, the effective data abstraction model." creating an effective" as recited in the claims.

As described in paragraphs [0064-0067] of the present application, creating an effective data abstraction model based on a view, as claimed, allows different groups of users to view different translations (most appropriate for their need) and/or control what fields are presented to a group of users. In contrast, there is no such teaching of creating any type of data model by modifying a data model in *Liddy*, or any mention of "security" at all, for that matter.

With respect to claims 6, 17, 36, and 41, *Liddy* fails to teach "providing translation information for the data abstraction model describing translations of each of the plurality of logical fields from a first natural language expression to two or more second natural language expressions; and displaying one of the second natural language expressions to a user, wherein which of the two or more second natural language expressions is displayed depends upon which natural language expression

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files are loaded to define a language resource component associated with the data abstraction model" as recited in the claims.

As described, for example, in paragraphs [0041] of the present application, providing two or more natural language expressions and selecting one of those for display, as claimed, allows users to see different views of a data model, depending on which natural language files are loaded, allowing different translations to be displayed in different circumstances. *Liddy* teaches translating queries and providing a user with an alternative representation, (see column 2 cited by Examiner), however, there is no teaching that any translation displayed is dependent on which files are loaded.

For these reasons, claims 1, 20, 25, 39, 40, 6, 17, 36, and 41, as well as their dependents are believed to be allowable, and withdrawal of this rejection is respectfully requested.

Claim Rejections - 35 U.S.C. § 103

Claims 5, 9, 24 and 28 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Liddy* in view of Pub. No.: 2004/0046789 to *Inanoria* (hereinafter, "*Inanoria*").

These claims depend, however, on claims that are believed to be allowable, for reasons discussed above. Accordingly, Applicants submit these claims are allowable and respectfully request withdrawal of this rejection.

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Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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